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November 8, 2000

By Hand

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
12th Street Lobby, TW-A-325
Washington, D.C. 20554

Re: Request for Extension of Time to File Report on
E911 Phase II Implementation Plan
WPQL238 -- Houston MTA, L.P.
CC Docket No. 94-102

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Salas:

Houston MTA, L.P., the licensee of PCS station WPQL238, hereby requests an extension of the deadline to file its E911 Phase II implementation report for this station. This report is currently due November 9, 2000. Houston MTA, L.P., which has temporarily been placed into a trust, requests that this deadline be extended until 45 days after it has been transferred to a third party from the trust.

As a condition of approval of the merger of Bell Atlantic Corporation ("Bell Atlantic") and GTE Corporation ("GTE"), the Commission and the U.S. Department of Justice ("DOJ") required the divestiture of certain cellular and PCS licenses. To afford themselves sufficient time to divest the licenses consistent with the Commission's rules and a consent decree entered into by the parties, Bell Atlantic and GTE, with Vodafone AirTouch Plc and Joseph J. Simons, Esq., as Trustee ("Trustee"), sought consent from the Commission and the DOJ to transfer control of Houston MTA, L.P. to a trust administered by the Trustee. On August 28, 2000, the Commission issued an Order granting this consent. *Public Notice*, DA 00-1975 (released Aug. 28, 2000). See also *In re Applications of GTE Corporation, Vodafone AirTouch PLC, and Bell Atlantic Corporation For Consent to Transfer Control of or Assign Properties to Divestiture Trust and For Temporary Waiver of the CMRS Spectrum Cap Rule*, Order, DA 00-1414 (June 26, 2000) ("Order").

Pursuant to the Commission's Order, control of Houston MTA, L.P., licensee of WPQL238, was transferred to the Trustee on August 29, 2000. Houston MTA, L.P. is being held in trust on behalf of AT&T Wireless Services of San Antonio, Inc. ("AT&T"), which has entered into an agreement with the parties to acquire this licensee. The Trustee and AT&T have filed an

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application to transfer control of Houston MTA, L.P. from the Trustee to AT&T. *See* File No. 0000192326; *Public Notice*, Rep. No. 679 (released Oct. 25, 2000). Upon grant of this application, and the divestiture by AT&T of certain other wireless properties in this market, Houston MTA, L.P. will be transferred to AT&T.

Houston MTA, L.P. will therefore be within the control of the Trustee for only a temporary period of time, and will be transferred to a third party well before the deadlines established by the Commission for wireless carriers to deploy E911 Phase II systems. The Trustee consequently requests that the Commissions extend the deadline for Houston MTA, L.P. to file its E911 Phase II implementation report until 45 days after control over WPQL238 has been transferred to a third party from the trust. This will permit a full and complete E911 Phase II implementation report to be filed by the party that will have control over WPQL238 when these new E911 requirements go into effect in 2001.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles W. Logan", with a stylized flourish at the end.

Charles W. Logan

Counsel for Joseph J. Simons, Trustee

cc: Blaise Scinto